

1 2 3 4 5	LAUREN GALLO WHITE, State Bar No. 3090 WILSON SONSINI GOODRICH & ROSATI Professional Corporation One Market Plaza Spear Tower, Suite 3300 San Francisco, CA 94105 Telephone: (415) 947-2000 Facsimile: (415) 947-2099 Email: lwhite@wsgr.com	75	
67	Attorneys for Defendant GOOGLE LLC		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN JOSE	DIVISION	
11			
12	AMBASSADOR MARC GINSBERG and COALITION FOR A SAFER WEB,) CASE NO.: 5:21-CV-00570-BLF)	
13 14	Plaintiffs,) JOINT STIPULATION AND) [PROPOSED] ORDER TO EXTEND) DEADLINE TO RESPOND TO	
15	v.	FIRST AMENDED COMPLAINT	
16	GOOGLE INC.,)) Ludge Deth Lehgen Engemen	
17	Defendant.) Judge Beth Labson Freeman	
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
	II		

CASE NO.: 5:21-CV-00570-BLF

1	JOINT STIPULATION		
2	Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, "Plaintiffs"),		
3	and Defendant Google LLC, erroneously sued as Google Inc. ("Google"), jointly submit this		
4	Stipulation to extend Google's deadline to respond to Plaintiffs' First Amended Complaint		
5	("FAC"):		
6	WHEREAS, Plaintiffs filed their complaint on January 25, 2021;		
7	WHEREAS, Google filed a motion to dismiss the complaint (ECF 14);		
8	WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF		
9	16), Plaintiffs' deadline to submit an opposition to Google's motion to dismiss was June 7, 2021;		
10	WHEREAS, in lieu of filing an opposition to Google's motion to dismiss, Plaintiffs filed		
11	their FAC on June 8, 2021 (ECF 17);		
12	WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Google's deadline to		
13	respond to Plaintiffs' FAC is June 22, 2021;		
14	WHEREAS, Google's counsel conferred with Plaintiffs' counsel to request an extension		
15	of Google's deadline to respond to the FAC, and Plaintiffs' counsel agreed to an extension of		
16	Google's response deadline to July 13, 2021;		
17	WHEREAS, the parties submit that this extension is appropriate to permit Google		
18	adequate time to assess and respond to the amended complaint, and in light of overlapping		
19	deadlines in other matters;		
20	THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,		
21	to the following:		
22	1. Google's deadline to respond to Plaintiffs' FAC shall be extended from June 22, 2021		
23	to July 13, 2021.		
24	2. Google consents to Plaintiffs' filing of a corrected complaint for the sole purpose of		
25	changing the party name in the caption from "Google, Inc." (which is incorrect) to		
26	"Google LLC."		
27			
28			

CASE No.: 5:21-CV-00570-BLF

1		Respectfully submitted,
2 3	Dated: June 10, 2021	WILSON SONSINI GOODRICH & ROSATI Professional Corporation
		By:/s/Lauren Gallo White
4		Lauren Gallo White
5		lwhite@wsgr.com
6		Attorneys for Defendant
7		GOOGLE LLC
8	Dated: June 10, 2021	THE LAW OFFICE OF KEITH ALTMAN
9		By: /s/ Keith Altman Keith Altman
10		Keith Altman kaltman@lawampmmt.com
11		
12		Attorneys for Plaintiffs AMBASSADOR MARC GINSBERG and
13		COALITION FOR A SAFER WEB
14	SIGNATURE ATTESTATION	
15	I, Lauren Gallo White, hereby attest that all other signatories listed, and on whose behalf	
16	the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed	
17	document.	
18]	By:/s/Lauren Gallo White
19		Lauren Gallo White
20	DUDGIJANT TO CTIDI II ATION IT IS SO OPDEDED	
	PURSUANT TO STIPULATION, IT IS SO ORDERED	
21		
22	Dated:	Honorable Beth Labson Freeman
23		United States District Court Judge
24		
25		
26		
27		
20		
28		

CASE NO.: 5:21-CV-00570-BLF